

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 9:08-80736-Civ-Marra/Johnson**

**JANE DOE #1 and JANE DOE #2**

**v.**

**UNITED STATES**  
\_\_\_\_\_ /

**UNOPPOSED MOTION OF JANE DOE NOS. 1, 2, 3, AND 4'S TO FILE A SINGLE,  
CONSOLIDATED PLEADING IN RESPONSE TO ALAN DERSHOWITZ'S  
MOTION FOR INTERVENTION, DECLARATION IN SUPPORT OF MOTION,  
AND SUPPLEMENT TO MOTION FOR INTERVENTION**

COME NOW Jane Doe No. 1 and Jane Doe No. 2, as well as Jane Doe No. 3 and Jane Doe No. 4 (collectively "the victims"),<sup>1</sup> by and through undersigned counsel, to file this unopposed motion for leave to file a single, consolidated pleading not to exceed 38 pages in response to several recent filings from movant Alan Dershowitz.

As the Court is aware, on January 2, 2015, Jane Doe No. 3 and Jane Doe No. 4 filed a (corrected) Motion Pursuant to Rule 21 for Joinder in Act (DE 280), seeking to join this CVRA case. In connection with that motion, they both proffered facts that they were prepared to prove in order to support their joinder in the case. On January 5, 2015, Dershowitz filed a motion for intervention in the case, seeking to contest some of the factual allegations made by Jane Doe No. 3 in support of her motion. (DE 282). In support of that motion, Dershowitz also filed an affidavit making strong charges against Jane Doe No. 3 and her legal counsel. *See, e.g.,*

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<sup>1</sup> Jane Doe No. 3 and Jane Doe No. 4 (the "new" victims) currently have pending before the Court a (corrected) Motion Pursuant to Rule 21 for Joinder in Action (DE 280). They understand that the Government will be filing an opposition to this motion early next week. As indicated in their motion for joinder, the new victims simply intend to join pleadings filed by the old victims. Accordingly, all four victims join in this motion, since it relates to a single pleading that all four wish to file together.

Dershowitz Aff. at 1-3 (accusing Jane Doe No. 3 in four places of telling a “deliberate lie” ); *id.* at 3-4 (accusing Jane Doe’s legal counsel “knew or could have easily learned” of the falsity of Jane Doe No. 3’s allegations of sexual contact and that “any reasonable investigation” would have produced “absolute proof” of the falsity). On January 12, 2015, Dershowitz filed a Supplement to his Motion for Intervention (DE 285) raising additional arguments about the why Jane Doe No. 3’s allegations were not properly before the Court.

The four victims are now preparing their response to all of these pleadings.<sup>2</sup> Because Dershowitz has filed two pleadings, the victims would be entitled under the local rules to file two, separate twenty-page responses – a total of forty pages. *See* Local Rule 7.1(C)(2) (response of no more than 20 pages allowed).

The victims now seek leave to file a single, consolidated response to all of Dershowitz’s filings. The issues covered by Dershowitz’s filings are important and complex, involving detailed factual and legal issues in this long-running case. The victims are drafting this pleading and hope to file it in the middle of next week. They are making every effort to keep their pleading as short as possible, but it currently spans 38 pages (exclusive of supporting materials). Rather than divide the pleading among two different responses, the victims believe that a single, consolidated response would be most efficient way to present their information to the Court.

Counsel for the victims have conferred with counsel for Dershowitz and counsel for the Government. Neither of them opposes this motion.

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<sup>2</sup> Jane Doe No. 3 plans to contest Dershowitz’s allegations that she has told “deliberate lies.” Jane Doe No. 4 plans to contest Dershowitz’s allegations in his supplemental pleadings that the Government violated her CVRA rights. *See* DE 285 at 2. Jane Doe No. 1 and Jane Doe No. 2 plan to endorse the allegations of Jane Doe No. 3 and explain how these allegations corroborate their allegations.

Accordingly, the Court should allow the four victims to file a single response not to exceed 38 pages in response to Dershowitz's filings. A proposed order to that effect is attached to this pleading.

DATED: January 16, 2015

Respectfully Submitted,

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### **CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on January 16, 2015, on the following using the Court's CM/ECF system:

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\* This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

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